

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 2:25-cv-02047-MSN-cgc
)	
FAYETTE COUNTY, TENNESSEE;)	
and THE FAYETTE COUNTY BOARD)	
OF COMMISSIONERS,)	
)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING**

Defendants, Fayette County, Tennessee and an entity known as “Fayette County Board of Commissioners”, by and through undersigned counsel and without waiving any and all defenses available, hereby moves the Court for an extension of time to file a response to the Plaintiff’s Complaint. In support thereof, Defendants state and show as follows:

1. The Complaint in this matter was filed on January 15, 2025. Defendants were served on January 21, 2025.
2. Undersigned counsel will be representing both named defendants in the above-styled matter.
3. In the interest of convenience and because further fact investigation is necessary to investigate Plaintiff’s complaints and allegations against Defendants before a responsive pleading is filed on their behalf, undersigned counsel requested of Plaintiff’s counsel an extension of time to file a responsive pleading on behalf of

Defendants, making a responsive pleading on behalf of both defendants due on or before March 28, 2025. Counsel for Plaintiff agreed to said extension.

4. In support of this motion, Defendants rely upon the Consultation of Counsel and shows to the Court that counsel for Plaintiff does not object to the present motion. Thus, counsel for the Defendants request an extension be granted until March 28, 2025, to serve a responsive pleading. It is the belief of counsel for Defendants that no prejudice will result to the Plaintiff because of this extension.

Respectfully submitted,

PENTECOST, GLENN & TILLY, PLLC

By: s/James I. Pentecost
James I. Pentecost (#11640)
Attorneys for Defendants
162 Murray Guard Drive, Suite B
Jackson, Tennessee 38305
(731) 668-5995 – Telephone
(731) 668-7163 – Facsimile
jpentecost@pgtfirm.com

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned certifies that defense counsel contacted Plaintiff's counsel via e-mail, regarding the relief sought in this motion. Plaintiff's counsel or representative informed that Plaintiff has no objection to this Motion for Extension of Time to File Responsive Pleading.

By: s/James I. Pentecost
James I. Pentecost

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document (Motion for Extension) was served via US District Court ECF system upon:

Sarah Pazar Williams
Assistant United States Attorney
United States Attorney's Office
167 North Main Street, Ste. 800
Memphis, TN 38103

on or before the filing date thereof.

DATE: This the 20th day of February, 2025.

By: s/James I. Pentecost
James I. Pentecost